UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

In Re: Methyl Tertiary Butyl Ether ("MTBE")

Products Liability Litigation

Master File No. 1:00 – 1898 **MDL 1358 (VSB)**

This Document Relates to:

New Jersey Department of Environmental Protection, et al. v. Atlantic Richfield Co., et al., No. 1:08-CV-00312-VSB

STIPULATION AND [PROPOSED] ORDER

On or about September 28, 2018, the Court granted Plaintiffs' Unopposed Motion for Leave to File a Fifth Amended Complaint;

IT IS HEREBY STIPULATED AND AGREED by and between Plaintiffs, newly-added Defendants Lukoil North America LLC, Lukoil Pan Americas, LLC, and PJSC Lukoil (collectively the "newly-added Lukoil Defendants"), and existing Defendants Lukoil Americas Corporation and Getty Petroleum Marketing Inc., that the newly-added Lukoil Defendants, Lukoil Americas Corporation and Getty Petroleum Marking Inc. shall have until Friday, April 3, 2020 in which to answer, move or otherwise respond to the Fifth Amended Complaint.

Dated: January 31, 2020

AGREED TO BY:

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Environmental Enforcement & Environmental Justice Section

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SO ORDERED,

Dated: February 4, 2020

Vernon S. Broderick

United States District Judge